

Dennis Stewart, CA Bar No. 99152
GUSTAFSON GLUEK PLLC
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 595-3299

Daniel E. Gustafson, MN Bar No. 202241
Amanda M. Williams, MN Bar No. 0341691
Matthew Jacobs, MN Bar No. 403465
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844

Darryl J. Horowitz, CA Bar No. 100898
COLEMAN & HOROWITT, LLP
499 West Shaw, Suite 116
Fresno, CA 93704
Telephone: (559) 248-4820

Robert J. Gralewski, Jr., CA Bar No. 196410
Marko Radisavljevic, CA Bar No. 306552
KIRBY McINERNEY LLP
1420 Kettner Boulevard, Suite 100
San Diego, CA 92101
Telephone: (858) 834-2044

Leonard B. Simon, CA Bar No. 58310
THE LAW OFFICES OF LEONARD B. SIMON P.C.
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: (619) 818-0644

Michael Lieberman, DC Bar No. 1033827
Jamie Crooks, CA Bar No. 310447
Yinka Onayemi, NY Bar No. 5940614
FAIRMARK PARTNERS, LLP
1001 G Street NW, Suite 400E
Washington, DC 20001
Telephone: (818) 585-2903

*Attorneys for Plaintiffs Shannon Ray, Khala Taylor,
Peter Robinson, Katherine Sebbane, and Rudy Barajas
Individually and on Behalf of All Those Similarly Situated*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

SHANNON RAY, KHALA TAYLOR, PETER
ROBINSON, KATHERINE SEBBANE, and
RUDY BARAJAS Individually and on Behalf of
All Those Similarly Situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, an unincorporated association,

Defendant.

Case No. 1:23-cv-00425

**PLAINTIFFS' NOTICE OF FILING
UNREDACTED AMENDED NOTICE
OF MOTION AND MOTION FOR
CLASS CERTIFICATION AND
EXHIBITS IN SUPPORT THEREOF**

Judge: Hon. William B. Shubb
Courtroom: 5, 14th Floor
Date: March 3, 2025
Time: 1:30 PM

TO DEFENDANT AND ITS ATTORNEYS OF RECORD AND TO THE UNITED STATES
DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA:

PLEASE TAKE NOTICE that Plaintiffs Shannon Ray, Khala Taylor, Peter Robinson, Katherine Sebbane, and Rudy Barajas (“Plaintiffs”), pursuant to Section VIII.A of the Stipulated Protective Order (ECF No. 56) and the Court’s February 14, 2025 Order (ECF No. 109) granting in part and denying in part Plaintiffs’ sealing requests (ECF Nos. 91, 101), hereby file unredacted copies of the following documents within five days of the order as requested by the Court:

- Plaintiffs’ Amended Notice of Motion and Motion for Class Certification.¹
- Exhibit 1 – Corrected Expert Report of Professor Orley Ashenfelter, dated November 26, 2024.
- Exhibits 27-31 – Were previously filed under seal, but the NCAA withdrew their objections, therefore, Plaintiffs are filing unredacted versions here.
- Exhibit 32 – Excerpts from Memorandum to the NCAA Division I Management Council regarding Commentary Regarding Proposed Changes in Division I Legislation in which the Division I Management Council did not take a position, dated February 28, 2001, bearing the bates stamp NCAA_SMART-COLON_0179751.
- Exhibit 33 – Email from Leeland Zeller to Steve Mallonee regarding Proposals, dated September 6, 2018, and bearing the bates stamp NCAA_SMART-COLON_0140536.
- Exhibits 35-44, 47-48 – Were previously filed under seal, but the NCAA withdrew their objections, therefore, Plaintiffs are filing unredacted versions here.

¹ The Amended Motion was lodged with the Court on December 13, 2024 to remove references to documents clawed back by third parties and Defendant after Plaintiffs filed their initial Motion (ECF No. 85).

DATED: February 19, 2025

Respectfully submitted,

GUSTAFSON GLUEK PLLC

By: /s/ Dennis Stewart

Dennis Stewart, CA Bar No. 99152
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 595-3299
dstewart@gustafsongluek.com

Daniel E. Gustafson, MN Bar No. 202241

(*pro hac vice*)

Amanda M. Williams, MN Bar No. 0341691

(*pro hac vice*)

Matthew Jacobs, MN Bar No. 403465

(*pro hac vice*)

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120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
dgustafson@gustafsongluek.com
awilliams@gustafsongluek.com
mjacobs@gustafsongluek.com

Michael Lieberman, DC Bar No. 1033827

(*pro hac vice*)

Jamie Crooks, CA Bar No. 310447

(*pro hac vice*)

Yinka Onayemi, NY Bar No. 5940614

(*pro hac vice*)

FAIRMARK PARTNERS, LLP

1001 G Street NW, Suite 400 East
Washington, DC 20001
Telephone: (818) 585-2903
michael@fairmarklaw.com
jamie@fairmarklaw.com
yinka@fairmarklaw.com

By: /s/ Robert J. Gralewski, Jr.

Robert J. Gralewski, Jr., CA Bar No. 196410

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1420 Kettner Boulevard, Suite 100
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bgralewski@kmlp.com

1 mradisavljevic@kmlp.com

2 Darryl J. Horowitt, CA Bar No. 100898
3 **COLEMAN & HOROWITT, LLP**
4 499 West Shaw, Suite 116
5 Fresno, CA 93704
6 Telephone: (559) 248-4820
7 dhorowitt@ch-law.com

8 Leonard B. Simon, CA Bar No. 58310
9 **THE LAW OFFICES OF LEONARD B.**
10 **SIMON P.C.**
11 655 West Broadway, Suite 1900
12 San Diego, CA 92101
13 Telephone: (619) 818-0644
14 lens@rgrdlaw.com

15 *Attorneys for Plaintiffs and the Class*